

EXHIBIT 6

DATE: **March 30, 2017**

TO: Roku Inc.

12980 Saratoga Avenue, Suite D

Saratoga, California 95070

Attn: Copyright Agent

E-mail: copyright@roku.com

I declare UNDER PENALTY OF PERJURY that:

1. I am the owner, or an agent authorized to act on behalf of the owner, which owner's name is

Komanda LLC and NTV America ("IP Owner"), of the following copyrighted work.

Identify, in sufficient detail, the copyrighted work that you claim has been infringed upon, including providing any registration number or other identification, if available. Attach applicable documents, if any.

See the following attached documents for information about Komanda LLC's and NTV America's respective copyrighted works:

- **March 30, 2017 Letter from David Guerrero Liston (the "Letter")**
- **March 30, 2017 Affidavit from Gregory Moscow (the "Affidavit")**

2. I have a good faith belief that the content described below and being made available to end users of the Company's products is not authorized by the IP owner, its agent, or the law, and therefore infringes the IP Owner's rights:

Identify the content that you claim is infringing the copyright identified above.

See the attached Letter and the Affidavit.

Where does the alleged infringing material appear? Please provide sufficient information to help us locate the content you are reporting.

The infringing materials appear on the Roku channels with the following access codes: **Redacted** **RTVCL.**

See the attached Letter and Affidavit for additional information.

Please describe how the content infringes your or the IP owner's rights (this question may assist us with processing your claim and eliminate the potential need for follow-up questions should your notice be unclear).

The content is infringing Komanda LLC's and NTV America's respective rights by distributing their respective copyrighted programming without authorization.

See the attached Letter and Affidavit for additional information.

Identify, if possible, information sufficient to permit the Company to notify the channel application developer and/or service provider of the allegedly infringing content.

See Schedule 1 in the attached Letter.

3. I acknowledge that this Notice, including my contact information, may be provided to the channel application developer and/or service provider associated with the alleged infringing content.

4. I may be contacted as follows:

My Name: **David Guerrero Liston, Esq.**

My Telephone: **(212) 822-0160**

Company or Other IP Owner (if different from me):

**Lewis Baach pllc Kaufman Middlemiss
The Chrysler Building
405 Lexington Avenue, 62nd Floor
New York, New York 10174**

Email: **david.liston@lewisbaach.com**

Check one of the boxes below.

The information I have provided in this statement is accurate.

I agree: ☒

I disagree: ☐

Electronic or Physical Signature:

/s David Guerrero Liston



David Guerrero Liston
212 822 0160
david.liston@lewisbaach.com

March 30, 2017

VIA EMAIL

Roku, Inc.
Attn: Douglas Weiss, Esq.
Director, Business & Legal Affairs
150 Winchester Circle
Los Gatos, California 95032

Re: Notice of Copyright Infringement Through Roku Platform

Dear Mr. Weiss:

We represent Komanda LLC, (“Komanda”) and NTV America (“NTV America”) (collectively, the Notifying Parties). We write to notify you of entities that are using Roku, Inc. (“Roku”)’s platform to distribute Komanda’s and NTV’s content without authorization.

Komanda is the worldwide copyright holder for certain content that is shown on Russian language television, including content that is shown on the Russian television network, Channel One. Among the programs to which Komanda is the copyright holder are the Russian television programs Davai Pogenimsya (Давай Поженимся), Kontrolnaya Zakupka (Контрольная Закупка), and Modny Prigovor (Модный Приговор) (the “Komanda Copyrighted Content”).

NTV America is the exclusive copyright holder in the United States for certain content that is shown on Russian language television, including content that is shown on the Russian television network, NTV. Among the programs to which NTV America is the copyright holder in the United States are the Russian television programs: Ostrosyuzhetnyy serial «Lesnik» (Остросюжетный сериал «Лесник»), Ulicy Razbityh Fonarej (Улицы Разбитых Фонарей), Serial «Svideteli» (Сериал «Свидетели»), and Chrezvychaynoye Proisshestviye (Чрезвычайное Происшествие) (the “NTV Copyrighted Content”).

Komanda and NTV have launched an investigation to identify parties who are streaming their respective content without authorization. As a result of that investigation, the Notifying Parties have identified two entities, as set forth in Schedule 1 to this letter (the “Pirates”) who are distributing, without authorization, the Komanda Copyrighted Content and the NTV Copyrighted Content.

The Pirates are rebroadcasting numerous Russian TV networks, including Channel One and NTV America on their respective Roku channels. The Pirates distribute the programming through the Roku platform to a subscriber through the live rebroadcast of the Russian TV networks, the archived rebroadcast of the Russian TV networks, and/or through a video on demand library.

Gregory Moscow, an Investigative Analyst at our firm, conducted an investigation that identified the Pirates. Enclosed with this letter is Mr. Moscow's affidavit, which includes screenshots that demonstrate the Pirates' use of the Roku platform to distribute the Komanda Copyrighted Content and the NTV Copyrighted Content.

Komanda has not authorized any of the Pirates, directly or indirectly, to distribute the Komanda Copyrighted Content in any manner whatsoever, including without limitation, the right to distribute the Komanda Copyrighted Content through any web streaming platform such as the Roku platform.

NTV has not authorized any of the Pirates, directly or indirectly, to distribute the NTV Copyrighted Content in any manner whatsoever, including without limitation, the right to distribute the NTV Copyrighted Content through any web streaming platform such as the Roku platform.

As Komanda and NTV did not authorize the Pirates to distribute the content, it is reasonable to assume that the Pirates are also distributing the content of other rightsholders without their authorization.

In light of the evidence that each of the Pirates is streaming the Komanda Copyrighted Content and the NTV Copyrighted Content without the authorization of Komanda or NTV, we respectfully request that Roku immediately disable each of the Pirate's channels on the Roku platform as well as on any devices or services offered by Roku.

Please note, upon information and belief, that each of these Pirates is operated by the same parties responsible for the Roku Channels identified in my March 13 and March 20 DMCA notices. Specifically, we believe that **Redacted**

Redacted the Roku channel RTVCL is operated by the same party or parties who operate the Roku channel INVID9. These parties (the "Related Pirates") were notified of their infringement by Roku after my March 13 and March 20 DMCA notices, but nonetheless continued to stream the Komanda Copyrighted Content and the NTV Copyrighted Content. Indeed, the screenshots attached to Mr. Moscow's affidavit demonstrate that the Pirates distributed the Komanda Copyrighted Content and the NTV Copyrighted Content as recently as March 24, 2017, and they are continuing to distribute the content today.

Despite being aware of the first two DMCA notices, the Pirates have continued to use "alternate" channels as a way to continue infringing our clients' content. Based on this, we respectfully request that you consider the Pirates identified in this letter, as well the Related Pirates identified above, to be repeat offenders and that you permanently terminate their accounts.

We would appreciate if you provide us with confirmation that Roku has taken the requested actions to prevent the continued use of Roku's services to facilitate the Pirates' infringement of the Komanda Copyrighted Content and the NTV Copyrighted Content.

Please do not hesitate to contact me at 212-822-0160 or david.liston@lewisbaach.com if you have any questions or if there is any additional information we can provide to you.

Respectfully submitted,

A handwritten signature in blue ink, reading "David Guerrero Liston". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

David Guerrero Liston

cc: Alex G. Patchen
Anthony M. Capozzolo
Ari J. Jaffess

Schedule 1

Redacted



3. **RUTV Club**

Roku Channel Access Code - RTVCL

8171 Yonge St. # 357, Markham, ON, L3T 2C6

Website - rutvclub.com

Contact Number - (647) 847-1220

Email Address - support@rutvclub.com

AFFIDAVIT OF GREGORY MOSCOW

STATE OF New York :
 : SS.:
COUNTY OF New York :

Gregory Moscow, being duly sworn, deposes and says:

1. I am an Investigative Analyst at the law firm Lewis Baach pllc Kaufman Middlemiss.
2. Our firm represents Komanda LLC ("Komanda") and NTV America ("NTV")
(collectively, the Notifying Parties).
3. I submit this affidavit in support of the Notifying Parties' March 30, 2017 letter to Roku, Inc. ("Roku") regarding entities that are using the Roku platform to distribute Komanda's and NTV's content without authorization (the "Notice Letter").
4. Komanda has advised our firm that it is the worldwide copyright holder for a number of programs that are shown on the Russian television network, Channel One. Among the programs that are shown on Channel One to which Komanda is the copyright holder are: Davai Pogenimsya (Давай Поженимся), Kontrolnaya Zakupka (Контрольная Закупка), and Modny Prigovor (Модный Приговор) (the "Komanda Copyrighted Content").
5. NTV has advised our firm that it is the exclusive copyright holder in the United States for a number of programs that are shown on the Russian television network, NTV. Among the programs that are shown on NTV to which NTV is the copyright holder in the United States are: Ostrosyuzhetnyy serial «Lesnik» (Остросюжетный сериал «Лесник»), Ulicy Razbityh Fonarej (Улицы Разбитых Фонарей), Serial «Svideteli» (Сериал «Свидетели»), and Chrezvychaynoye Proisshestviye (Чрезвычайное Происшествие) (the "NTV Copyrighted Content").

6. Komanda and NTV have requested that our firm assist them in identifying parties that are streaming, without authorization, the Komanda Copyrighted Content and the NTV Copyrighted Content over the Internet, including through IPTV streaming platforms such as Roku.

7. As a part of this investigation, we identified two entities that are streaming the Komanda Copyrighted Content and the NTV Copyrighted Content (the “Pirates”).

8. The Pirates are rebroadcasting numerous Russian TV networks through their respective Roku channels, including the networks Channel One and NTV. The Pirates distribute the programming through the Roku platform to a subscriber through the live rebroadcast of the Russian TV networks; the archived rebroadcast of the Russian TV networks, and/or through a video on demand library.

9. With respect to each of the Pirates, as set forth below, and as seen in the attached screenshots (Exhibits 1-3), I was able to stream the Komanda Copyrighted Content and the NTV Copyrighted Content from each of the Pirate’s respective Roku channels. Each of the screenshots in Exhibits 1-3 are true and accurate screen captures that I personally captured from the Roku platform or the Pirates’ websites, without making any substantive edits.

Redacted

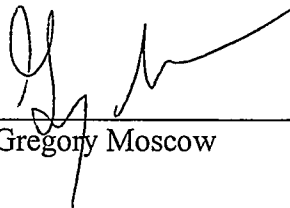


Redacted

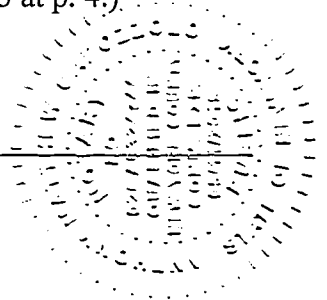


12. RUTVClub – Exhibit 3

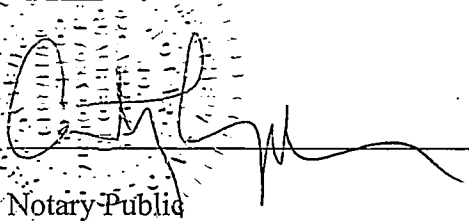
- a. On March 2 and 24, 2017, I used the Roku channel access code “RTVCL” to add RUTVClub’s channel to a Roku account. (Ex. 3 at p. 1.)
- b. During the same time period, I also accessed the Roku channel with access code INVID9. RUTVClub’s Roku channel looks identical to the Roku channel, INVID9. (Ex. 3 at p. 5.)
- c. Komanda
 - i. On March 24, I was able to watch the program Modny Prigovor (Модный Приговор) through RUTVClub’s archive, which was originally shown live on Channel One on March 23, through the Roku channel RTVCL. (Ex. 3 at p. 2.)
 - ii. On March 24, I was able to watch the program Kontrolnaya Zakupka (Контрольная Закупка) through RUTVClub’s archive, which was originally shown live on Channel One on March 22, through the Roku channel RTVCL. (Ex. 3 at p. 3.)
- d. NTV
 - i. On March 24, I was able to watch the program Chrezvychaynoye Proisshestiye (Чрезвычайное Происшествие), which was being shown live on NTV, through the Roku channel RTVCL. (Ex. 3 at p. 4.)



Gregory Moscow



Sworn to before me this
30th day of March, 2017



Notary Public

ANTHONY MATTHEW CAPOZZOLO
NOTARY PUBLIC-STATE OF NEW YORK
NO. 02CA6324744
QUALIFIED IN NEW YORK COUNTY
MY COMMISSION EXPIRES 05-11-2019

EXHIBIT 1

Redacted



Redacted



Redacted



Redacted



Redacted



Redacted



EXHIBIT 2

Redacted



Redacted



Redacted



Redacted



Redacted



Redacted



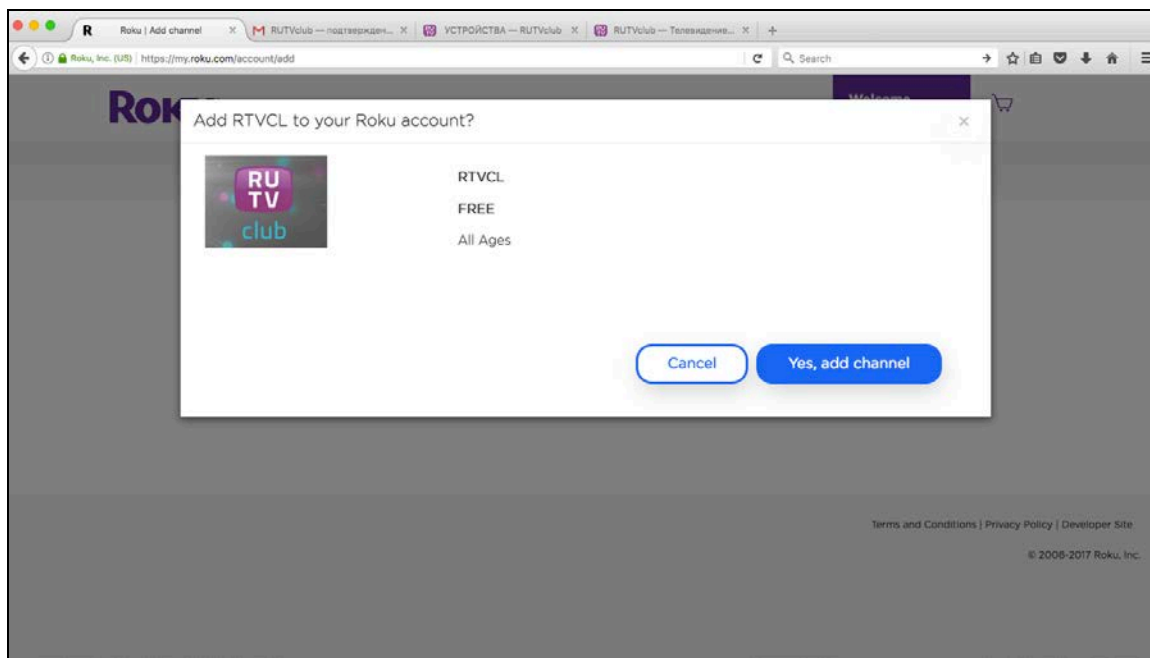
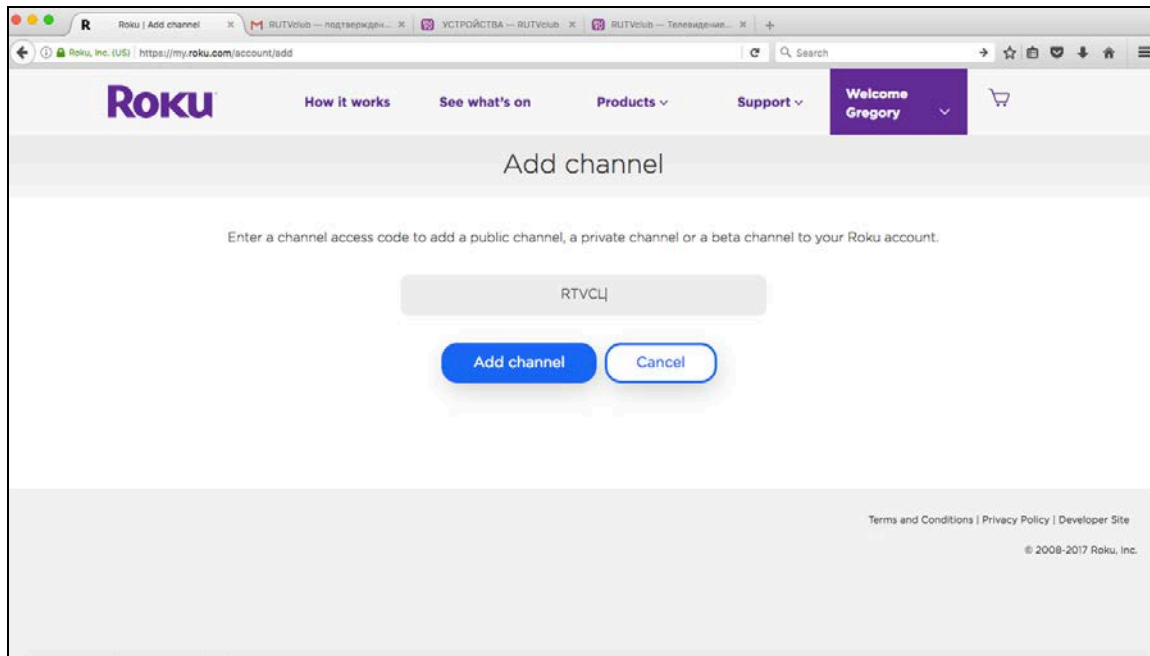
Redacted



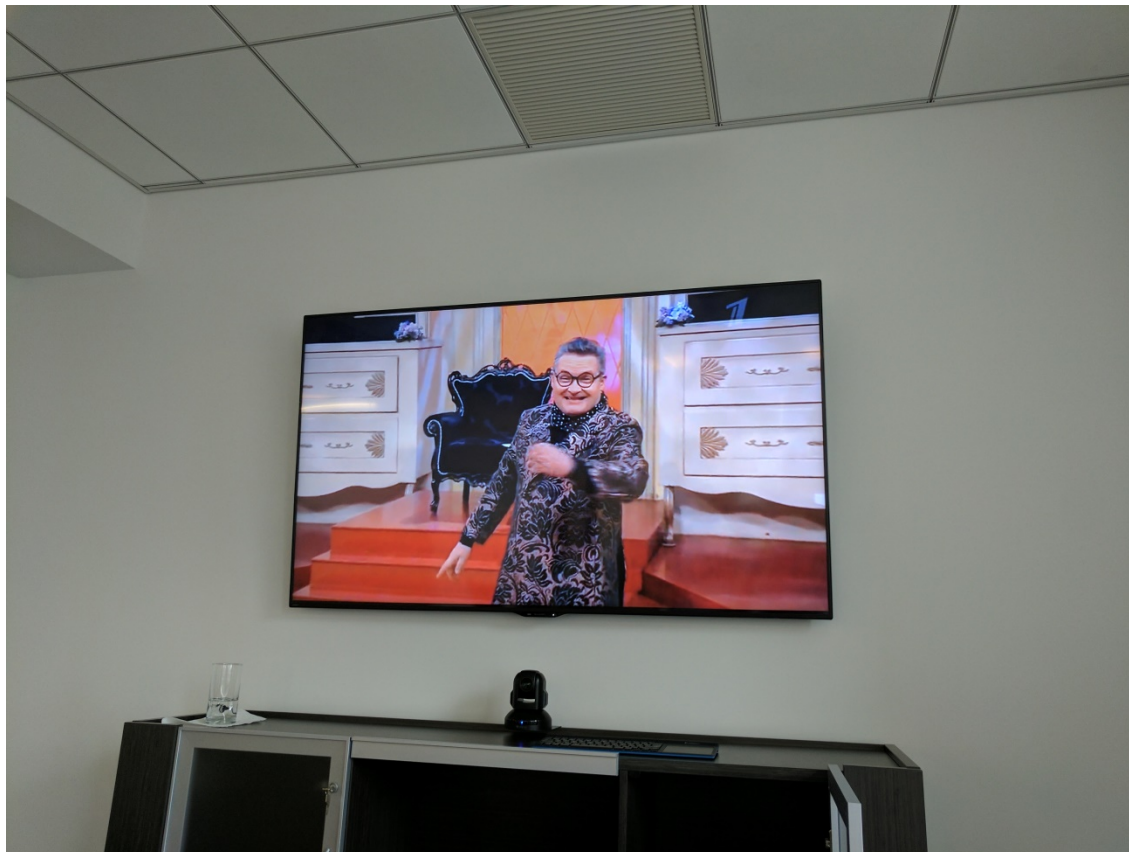
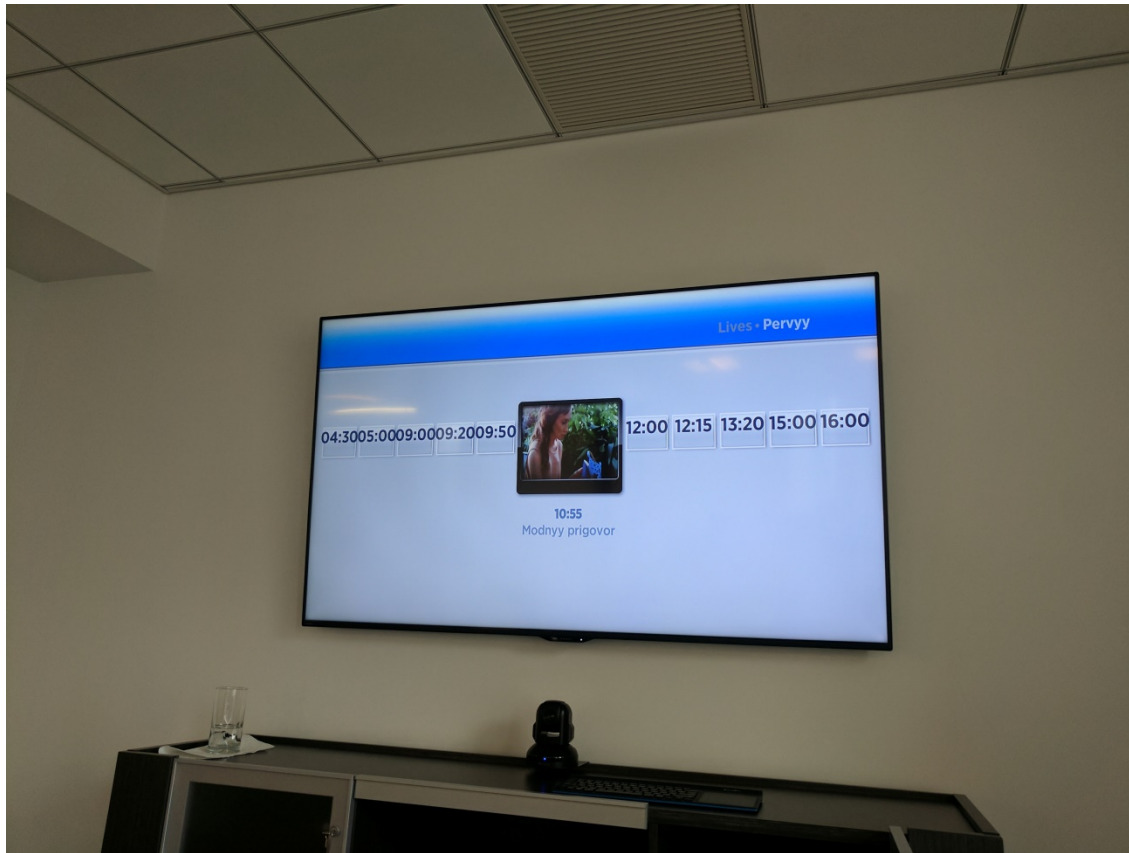
Redacted



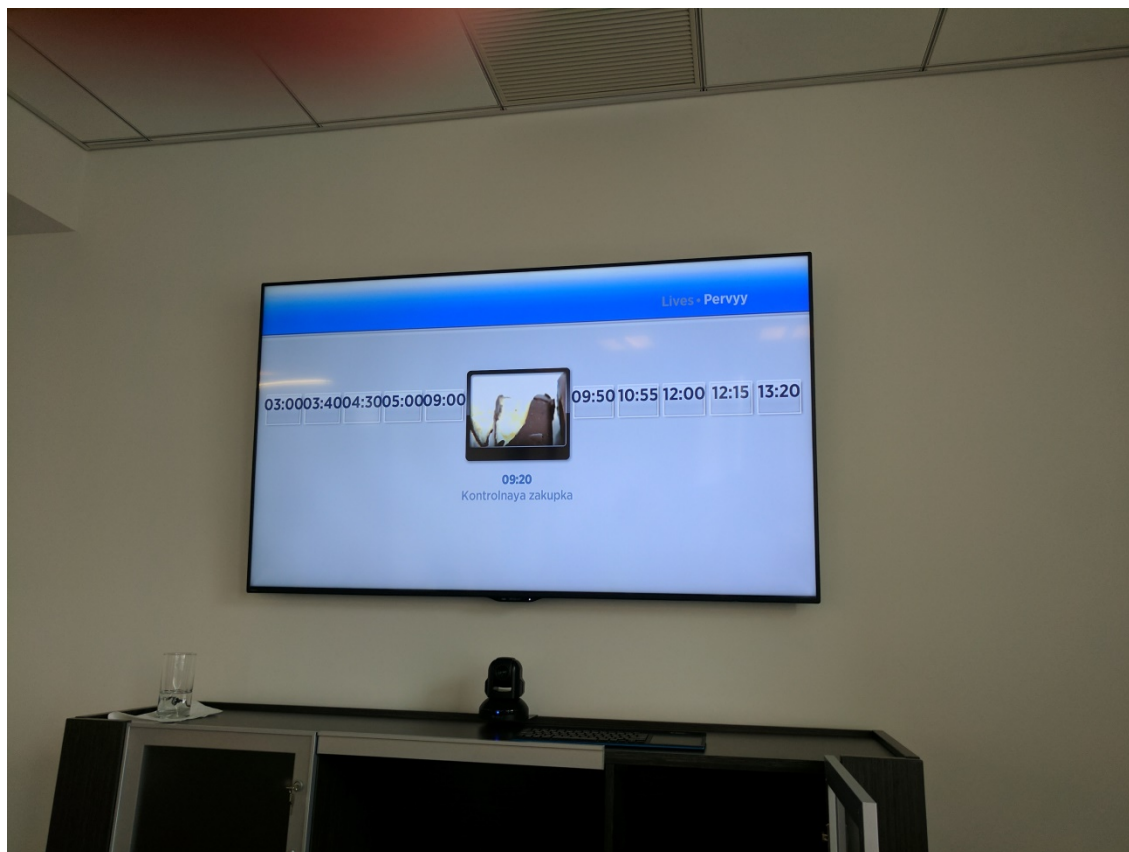
EXHIBIT 3



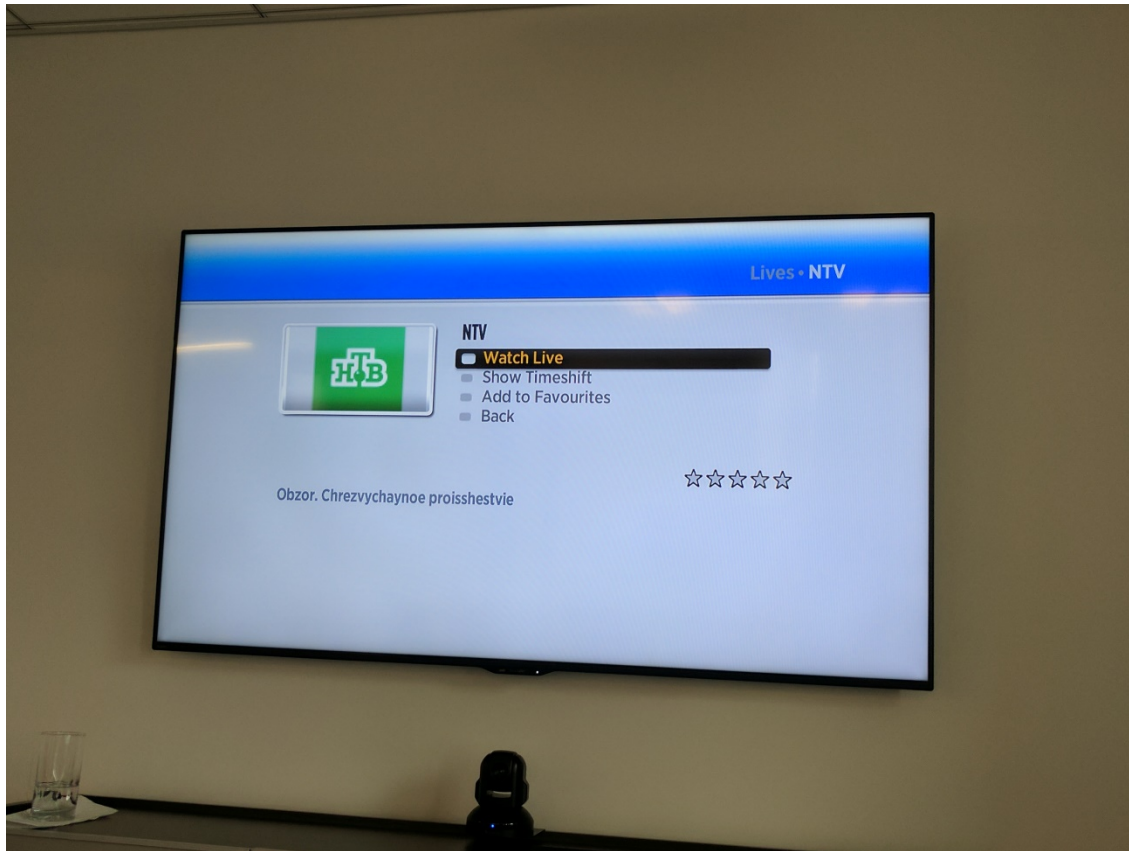
March 23, 2017 – Modny Prigovor (Модный Приговор) – Archived Broadcast



March 22, 2017 – Kontrolnaya Zakupka (Контрольная Закупка) – Archived Broadcast

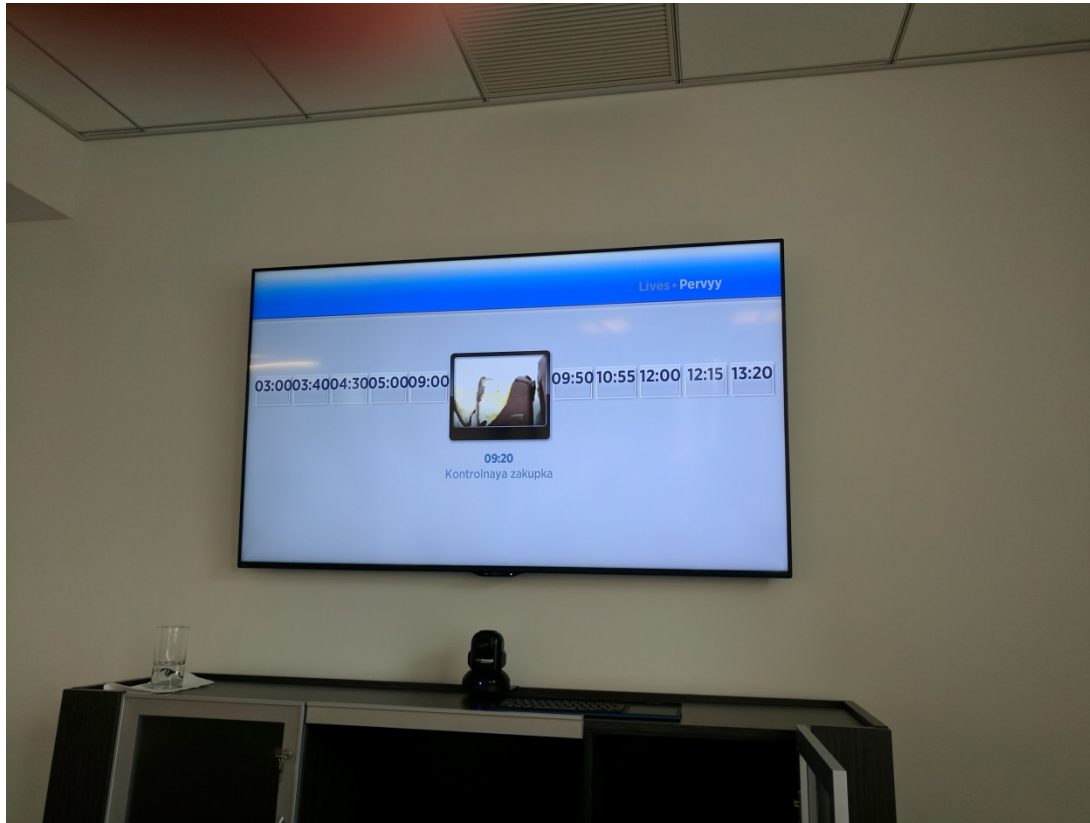


March 24, 2017 – Chrezvychaynoye Proisshestviye (Чрезвычайное Происшествие) – Live Broadcast



Comparison of RUTVClub Roku Channel with TVTEKA Roku Channel

RUTVClub Roku Channel



TVTEKA Roku Channel (INVID9)

